

1.0 INTRODUCTION

This **Cleanup Action Work Plan** has been completed for implementation of the final cleanup of the former Priceless Gas, a leaking underground storage tank (LUST) site, located at 1110 Morgan Street, in Davenport (Lincoln County), Washington. Refer to the vicinity and site maps provided as Figures 1 and 2. The final cleanup at this Site is to be conducted in accordance with the provisions of Washington State Department of Ecology (Ecology) Enforcement Order No. 03TCPER-5598; and the scope of this **Work Plan** is documented in the **Final Cleanup Action Plan** (CAP), prepared by Washington State Department of Ecology in June 2003. Previous investigative work is summarized and referenced as part of the CAP and includes the following:

- Remedial Investigation / Feasibility Study – Priceless Gas (2001)
- Remedial Investigation – Priceless Gas (2000)
- Site Investigation, UST Removal and Remedial Activities Report – Priceless Gas (1999)
- Remedial Investigation / Feasibility Study – Corner Express (2002)
- Final Cleanup Action Plan for the Former Corner Express (January 2003)

1.1 BACKGROUND INFORMATION

The following are provided in Appendix A of this **Work Plan**, summarizing the nature and extent of soil and groundwater contamination and existing conditions at the Priceless Gas Site:

- Surface topography map
- Bedrock surface map
- Cross Sections
- Contaminated soil removal and concentration maps and summary tables
- Groundwater flow map dated 3/31/2004
- Summary table and hydrographs for all monitoring wells
- Groundwater monitoring summary tables
- Comparisons of groundwater concentrations (including 3/31/2004 sampling)
- Laboratory data sheets for 3/31/2004 sample collection (MW-1, MW-2, MW-3, and MW-4)
- Comparison of Chromatographic Data from Corner Express Texaco and Priceless Gas Sites (April 16, 2003)

Upgradient remedial activities at the former Corner Express Texaco Site included (refer to the Final Cleanup Action Plan, January 2003): tank and associated piping removal, contaminated soil excavation, groundwater air-sparge and soil vapor extraction systems within the UST excavation, and backfilling of excavated areas with appropriate materials.

Site maps and groundwater data summaries are also provided in Appendix A of this *Work Plan*.

1.2 FINAL CLEANUP ACTION PLAN

The Final CAP (included in Appendix A of this *Work Plan*) summarizes an historical review of Site activities and conditions, nature and extent of contamination, cleanup standards, and cleanup action alternatives screening and selection. In summary, the selected final cleanup action for the Priceless Gas Site consists of the following elements:

- Soil removal (associated with construction) and site grading/compaction;
- Product recovery at MW-3 on south property boundary (upgradient);
- Groundwater treatment within trench along the north property boundary (downgradient);
- Backfilling of excavated areas with appropriate materials;
- Quarterly sampling and analysis of groundwater monitoring wells designated as points of compliance or performance monitoring points;
- Institutional controls.

Applicable or relevant and appropriate requirements for the selected cleanup action are summarized in the following table:

CLEANUP ACTION IMPLEMENTATION	
Ch. 18.104 RCW Ch. 173-160 WAC	Water Well Construction; Minimum Standards for Construction and Maintenance of Water Wells
Ch. 173-162 WAC	Rules and Regulations Governing the Licensing of Well Contractors and Operators
Ch. 70.105D RCW; Ch. 173-340 WAC	Model Toxics Control Act; MTCA Cleanup Regulation
Ch. 43.21C RCW; Ch. 197-11 WAC	State Environmental Policy Act SEPA Rules
29 CFR 1910	Occupational Safety and Health Act
GROUNDWATER	
33 USC 1251; 40 CFR 131	Clean Water Act of 1977; Water Quality Standards
Ch. 70.105D RCW; Ch. 173-340 WAC	Model Toxics Control Act MTCA Cleanup Regulation
Ch. 173-200 WAC	Water Quality Standards for Ground Waters of the State of Washington
AIR	
42 USC 7401; 40 CFR 50	Clean Air Act of 1977 National Ambient Air Quality Standards
Ch. 70.94 RCW; Ch. 43.21A RCW; Ch. 173-400 WAC	Washington Clean Air Act; General Regulations for Air Pollution
Ch. 173-460 WAC	Controls for New Sources of Air Pollution
Ch. 70.105D RCW; Ch. 173-340 WAC	Model Toxics Control Act; MTCA Cleanup Regulation

1.3 SITE CLEANUP LEVELS

1.3.1 Site Cleanup Levels for Soil

The point of compliance for meeting soil cleanup levels at the Priceless Gas Site was selected on the basis of the provisions of WAC 173-340-740(6). The point of compliance for soils is the entire site.

Soil cleanup levels have been established for the site using MTCA Method A, as provided for in WAC 173-340-740(2). This method was determined to be consistent with WAC 173-340-704(1) which provides that MTCA Method A cleanup levels are appropriate for those sites with few hazardous substances, undergoing a routine cleanup action as defined in WAC 173-340-200.

CONSTITUENT	SOIL CLEANUP LEVEL	SAMPLE RESULTS FROM RI
BENZENE	0.03 mg/kg	ND – 7.08 mg/kg
TOLUENE	7 mg/kg	ND – 52.7 mg/kg
ETHYLBENZENE	6 mg/kg	ND – 36 mg/kg
XYLENES	9 mg/kg	ND – 170 mg/kg
MTBE	0.10 mg/kg	ND – 5.74 mg/kg
TPH (Gasoline)	30 mg/kg	ND – 1,730 mg/kg
TPH (Diesel)	2,000 mg/kg	ND – 111 mg/kg

ND = less than laboratory method detection limit

mg/kg = ppm

TPH (G) = Total Petroleum Hydrocarbons (Gasoline range)

TPH (D) = Total Petroleum Hydrocarbons (Diesel range)

1.3.2 Site Cleanup Levels for Groundwater

The points of compliance for meeting groundwater cleanup levels at the Priceless Gas Site were selected on the basis of the criteria specified in WAC 173-340-720(8). The points of compliance are monitoring wells MW-1, MW-2, MW-3, and MW-6 (refer to Figure 2 for compliance well locations).

Groundwater cleanup levels have been established for the Site using MTCA Method A as provided for in WAC 173-340-720(3). Although the groundwater in this area is an unlikely source of potable groundwater, Ecology has chosen to apply the more conservative cleanup values defined under Method A. The conservative approach was selected out of consideration of the potential threat to Cottonwood Creek and historical problems with increased exposure risk due to the high groundwater conditions.

CONSTITUENT	GROUNDWATER CLEANUP LEVEL	SAMPLE RESULTS FROM RI
BENZENE	5 µg/l	4.81 – 41,800 µg/l
TOLUENE	1,000 µg/l	0.624 – 3,730 µg/l
ETHYLBENZENE	700 µg/l	ND – 2,040 µg/l
XYLENES	1,000 µg/l	ND – 5,740 µg/l
MTBE	20 µg/l	154 – 2,750 µg/l
TPH (Gasoline)	800 µg/l	ND – 41,800 µg/l
TPH (Diesel)	500 µg/l	ND – 4,540 µg/l

ND = less than laboratory method detection limit

µg/l = ppb

TPH (G) = Total Petroleum Hydrocarbons (Gasoline range)

TPH (D) = Total Petroleum Hydrocarbons (Diesel range)

1.3.3 System Performance Monitoring

Quarterly groundwater monitoring will include the sampling and analysis of previously identified points of compliance wells (MW-1, MW-2, MW-3, and MW-6) and system performance will be accomplished through the sampling of: MW-4, MW-5, MW-7, MW-8, MW-9, and MW-10 (refer to Figure 2 for system performance monitoring well locations). Groundwater monitoring will continue until compliance with the established cleanup levels is demonstrated for four (4) consecutive quarterly sampling events. Groundwater monitoring will be conducted in a manner consistent with the MTCA provisions for compliance monitoring described in WAC 173-340-720(9).

Sample collection and laboratory analyses will be conducted in accordance with the ***Sampling and Analysis Plan***, provided in Appendix B. Field sampling activities will be conducted in accordance with the ***Health and Safety Plan*** for the Site, provided as Appendix C.

1.4 SUPPLEMENTAL DOCUMENTS

This ***Cleanup Action Work Plan*** includes the following supplemental documents, provided as appendixes:

Appendix B: ***Sampling and Analysis Plan (SAP)*** including description of the quality assurance/quality control (QA/QC) measures

Appendix C: ***Health and Safety Plan (HSP)***

Appendix D: ***Public Participation Plan (PPP)***

Appendix E: Proposed Restrictive Covenant language